REMARKS

Administrative Overview

Claims 20-24, 26-37 and 55-56 were presented for examination. Applicant amends Claims 20, 23 and 26. Upon entry of the present amendments, Claims 20-24, 26-37 and 55-56 are presented for examination, of which Claim 20 is independent. No new matter has been added by the proposed claim amendments.

Applicant respectfully requests reconsideration of all claims and withdrawal of the objections and rejections, to the extent they are maintained over the claims as amended.

Rejections under 35 U.S.C. § 112

Claims 20-24, 26-37, 55 and 56 are rejected under 35 U.S.C. § 112, first paragraph, for failing to comply with the written description requirement. Applicants respectfully submit that the amendments made to Claims 20 and 26 overcome this rejection. Accordingly, Applicants respectfully request that the Examiner withdraw this rejection.

Rejections under 35 U.S.C. § 103

Claims 20-23 and 31-37

Claims 20-23 and 31-37 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Publication No. 2001/0047406 to Araujo et al. ("Araujo") in view of U.S. Patent Publication No. 2005/0186913 to Varanda ("Varanda.") Applicant respectfully submits that Claims 20-23 and 31-37 as previously presented are patentable over Araujo in view of Varanda. However, Applicant hereby amends Claims 20 and 23 to more clearly recite the claimed invention. Applicant respectfully submits that amended Claims 20-23 and 31-37 are patentable over Araujo in view of Varanda.

Prima facie obviousness is shown only when one or more references, together or alone, teach or suggest each and every element of the claimed invention. Applicant respectfully submits that Araujo and Varanda fail to teach or suggest the claimed invention because Araujo and Varanda do not teach or suggest a proxy server that generates a static image in response to determining that a predetermined percentage of a virtual screen buffer changed state, as required by independent Claim 20.

As admitted by the Examiner, Araujo does not explicitly disclose determining a predetermined percentage of a virtual screen buffer changed state, or taking an action in response to making such a determination. *See* Office Action mailed on January 27, 2010, pages 6-7. The Examiner relies on Varanda to cure this deficiency in Araujo.

Like Araujo, Varanda also does not describe determining a predetermined percentage of a virtual screen buffer changed state, or generating a static image in response to making such a determination. Varanda describes a client machine that is informed by a wireless device when a change occurs on a LCD display. The wireless device receives a request to inform the client machine when a change occurs, informs the client machine when a change occurs, and the client machine responsively sends a request for a screen update to the server. *See* Varanda, para. 34-37. In Varanda, the client machine does not determine a predetermine percentage of a screen buffer changed state, rather the client machine receives a message from a device indicating an event occurred. At best, Varanda describes a mobile client device that determines when a change occurs to data stored in a screen buffer.

Varanda further fails to describe generating a static image in response to determining a predetermined percentage of a virtual screen buffer changed state. Instead, Varanda describes a server that generates a screen update in response to receiving a request from a client machine. Therefore Varanda fails to teach or suggest both determining a predetermined percentage of a virtual screen buffer changed state, and generating a static image in response to making such a determination.

In light of the above-made remarks, any combination of Araujo and Varanda fails to teach or suggest the claimed invention. Therefore, Claim 20 is patentable over any combination of Araujo and Varanda, as are Claims 21-23 and 31-37 which depend on and incorporate the limitations of Claim 20. Accordingly, Applicant respectfully requests that the Examiner withdraw this rejection.

Claims 26, 29, and 30

Claims 26, 29, and 30 are rejected under 35 U.S.C. § 103(a) as unpatentable over Araujo in view of Varanda and in further view of U.S. Patent Publication Number 2002/0091738 to Rohrabaugh et al. ("Rohrabaugh.") Applicant respectfully submits that Claims 26, 29, and 30 as previously presented are patentable over any combination of Araujo, Varanda and Rohrabaugh.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicant respectfully submits that independent Claim 20 is patentable and in a condition for allowance. Therefore Claims 26, 29, and 30 are also patentable and in a condition for allowance because Claims 26, 29, and 30 depend on and incorporate all the patentable subject matter of Claim 20. Furthermore, the Examiner cites Rohrabaugh merely to address applying lossy image compression to application data and transmitting a GIF or JPEG image representing the static image. Like Araujo and Varanda, Rohrabaugh also fails to teach or suggest determining a predetermined percentage of a virtual screen buffer changed state, or generating a static image in response to making such a determination. Thus, Rohrabaugh fails to detract from the patentability of the claimed invention. Applicant therefore respectfully requests that the Examiner withdraw the rejection with respect to these claims.

Claims 55 and 56

Claims 55 and 56 are rejected under 35 U.S.C. § 103(a) as unpatentable over Araujo in view of Varanda and in further view of U.S. Patent Number 5,983,247 to Yamanaka et al. ("Yamanaka.") Applicant respectfully submits that Claims 55 and 56 as previously presented are patentable over any combination of Araujo, Varanda and Yamanaka.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicant respectfully submits that independent Claim 20 is patentable and in a condition for allowance. Therefore Claims 55 and 56 are also patentable and in a condition for allowance because Claims 55 and 56 depend on and incorporate all the patentable subject matter of Claim 20. Furthermore, the Examiner cites Yamanaka merely to address determining an acceptable amount of image loss and compressing the static image according to the determined amount of image loss. Like Araujo and Varanda, Yamanaka also fails to teach or suggest determining a predetermined percentage of a virtual screen buffer changed state, or generating a static image in response to making such a determination. Thus, Yamanaka fails to detract from the patentability of the claimed invention. Applicant therefore respectfully requests that the Examiner withdraw the rejection with respect to these claims.

Claims 24, 27, and 28

Claims 24, 27, and 28 are rejected under 35 U.S.C. § 103(a) as unpatentable over Araujo in view of Varanda and in further view of U.S. Patent Publication Number 2003/0055327 to Shaw et al. ("Shaw.") Applicant respectfully submits that Claims 24, 27, and 28 as previously presented are patentable over any combination of Araujo, Varanda and Shaw.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicant respectfully submits that independent Claim 20 is patentable and in a condition for allowance. Therefore Claims 24, 27, and 28 are also patentable and in a condition for allowance because Claims 24, 27, and 28 depend on and incorporate all the patentable subject matter of Claim 20. Furthermore, the Examiner cites Shaw merely to address modifying application data prior to compression by changing the color depth of the data or scaling the data. Like Araujo and Varanda, Shaw also fails to teach or suggest determining a predetermined percentage of a virtual screen buffer changed state, or generating a static image in response to making such a determination. Thus, Shaw fails to detract from the patentability of the claimed invention. Applicant therefore respectfully requests that the Examiner withdraw the rejection with respect to these claims.

Conclusion

Applicant contends that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicant's agent would expedite prosecution of this application, the Examiner is urged to contact Applicant's agent at the telephone number identified below.

Respectfully submitted,
CHOATE, HALL & STEWART LLP

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/KellanD.Ponikiewicz/
Kellan D. Ponikiewicz
Registration Number: 59,701

Patent Group
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
Phone: (617) 248-5000
Fax: (617) 502-5002